RCRA COMPLIANCE MONITORING INSPECTION

1. INSPECTOR AND AUTHOR OF REPORT

David K. Peacock
Environmental Administrator - RCRA Section
Mississippi Department of Environmental Quality

2. FACILITY INFORMATION

Randall-Textron
Highway 332 East
Grenada, MS 38901
MSD007037278

3. RESPONSIBLE COMPANY OFFICIAL

Mr. Frank Logan, Plant Manager

4. INSPECTION PARTICIPANTS

David K. Peacock - MDEQ
Mr. Don Williams - Plant Env. Coordinator, Randall-Textron

5. DATE AND TIME OF INSPECTION

September 22, 1995 @ 9:30 A.M. CST

6. APPLICABLE REQUIREMENTS

Mississippi Hazardous Waste Management Regulations (MHWMR) Parts 262 and 265.

7. PURPOSE OF INSPECTION

A Compliance Evaluation Inspection (CEI) was conducted to determine Randall-Textron's compliance status with the applicable requirements.

8. FACILITY DESCRIPTION

Randall Textron's Grenada, Mississippi is located at 635 Highway 332 East. Originally built in 1960 by Lyons, Inc., the facility was sold to North American Rockwell in 1966, and subsequently sold to Randall-Textron in 1985. Located in an industrial park area north of City of Grenada proper, the facility is bounded to the north and east by lines of the Central Gulf Railroad, to the west by Highway 332, and to the south by undeveloped wetlands/rural areas. Riverdale Creek runs along the northwest quadrant of the facility's property, and empties into the Yalobusha River, approximately one mile downstream.

Randall-Textron manufactures wheel covers for various automobile manufacturers. Activities associated with the process include parts stamping, rolling, washing, polishing, electroplating, and painting.

The electroplating process generates the characteristic hazardous waste D007 in the form of sediment bottoms and rinsate waters. Wastewater from this process was previously sent to a chrome reduction unit and then to a settling basin, which was part of the facility's wastewater treatment system. Sediment in the settling basin was analyzed and determined to meet the F006 hazardous waste listing. The equalization lagoon, or settling basin, measured approximately 525 x 225 x 10 feet, with a maximum capacity of 2,500,000 gallons of liquid. The lagoon was taken off-line on July 20, 1994 and closure with waste in place was completed in November, 1994.

Rinsate waters are presently recycled. Any overflow/spillage of water from the process areas are cycled to a large concrete in-ground tank called the "destruct pit". Total capacity of the tank is 17,000 gallons. When sufficient amount is collected rinsate water is pumped to a recovery unit inside the plant which distills the water and concentrates the chrome. Any recovered chrome is returned to chrome tanks, and back into the electroplating process.

The painting operation process previously generated waste TCE which met the F002 listing and the characteristic listing D040. The process has been changed and TCE was replaced with tri-sodium phosphate and sodium medasilicate.

The facility previously generated D001 characteristic waste, Safety Kleen petroleum naphtha, in parts washers used at the facility. The petroleum naphtha has been replaced with Non-Haz, a mineral spirits-based cleaner which does not meet the D001 listing.

Currently, the wastes generated at the facility are from two sources. The electroplating operation generates rinsate waters and tank bottoms that meet the D007 listing. Cleaning procedures in the painting operations generate waste toluene, a listed hazardous waste (F005). It should also be noted that corrective interim measures being undertaken by Rockwell are being managed, stored, and manifested using Randall-Textron facilities and supervision.

9. <u>FINDINGS</u>

A visual site inspection of the areas of concern was conducted. Closure activities of the equalization lagoon were observed to have been completed. The cap was completed, graded, and a good stand of vegetation had been started. No visible signs of erosion were seen. Access to the closed

unit was controlled by Randall-Textron's facility fence to the west and north of the unit. No barrier existed on the south and east side of the impoundment. No warning signs were visible from any direction of access.

Randall-Textron's satellite accumulation area for the paint operation was inspected and found to be in compliance. One drum containing waste toluene (F005) was present, properly labeled and closed.

Randall-Textron's less-than-90-day storage area exceeds requirements set forth by applicable regulations. The area is bermed, roofed, fenced and locked, and warning signs are clearly visible. At the time of this inspection a total of eleven (11) drums of hazardous waste were stored in the container area. All drums were properly labelled and had not exceeded the 90 day limit.

Two interim corrective measures operations are presently ongoing at Randall's facility, but under Rockwell's supervision. Approximately 10 feet east of the main building a recovery well has been installed to recover toluene in the groundwater. Current recovery rate for the toluene is approximately 50 gallons per week. All recovered toluene is presently sent off-site for recycling. Another recovery well, approximately 150 feet east of the main building is recovering TCE at a rate of approximately 2 gallons per week. This unit is enclosed in a covered shed with locking door. The recovered TCE is manifested as a hazardous waste (D007). Both units are segregated from unauthorized entrance with "CAUTION -- DO NOT ENTER" tape. No evidence of leakage was observed at either unit.

A record review followed the visual site inspection. Records of interest included training records, inspection reports, hazardous waste shipping manifests, contingency plan, waste analysis, financial records, closure plan, and waste minimization plan. All records appeared complete, and up-to-date. A subsequent review of records on file at this office showed that the final closure was certified on November 18, 1994. Within sixty (60) days of this date, the owner/operator must submit to this office certification that a deed notation has been executed, as well as a copy of the document in which the notation was placed.

10. CONCLUSIONS

Randall-Textron appears to be in violation of the following regulations:

REGULATORY CITATION		
1. MHWMR 265.14(c)	-	a sign with the legend "Danger - Unauthorized Personnel Keep Out"

must be posted at each entrance to the active portion of the facility in sufficient numbers to be seen from any approach to the unit.

2. MHWMR 265.119(b)(2) - Within 60 days of certification of closure of the hazardous waste unit the owner/operator shall submit to the Regional Administrator a certification signed by the owner or operator that he has recorded the deed notation to the facility property in the proper instrument, as well as a copy of the document in which the notification appears.

11. **RECOMMENDATIONS**

It was noted during the record review that no documentation was kept as to any inspections of the closed surface impoundment. Mr. Williams stated that the impoundment was observed on a daily basis during his facility walk-through, but no notation was made of this on existing inspection forms. Since the unit is in the process of post-closure permit issuance no regulatory requirements exist for periodic inspections. While not regulatory bound, it is this Agency's belief that the facility should in some manner document that the closed unit is being periodically inspected and any remedial actions so noted. This procedure for inspection of the unit should remain in effect until the post-closure permit is issued.

12. **SIGNED**

David K. Powers — 10/12/95 Date

13. **APPROVAL**

Jerry L. Barton — 10/13/95 Date

TOP-View from top of closed equalization lagoon. Picture taken from south looking north.

BOTTOM-Closed equalization lagoon taking looki west. Note good stand of vegatative cover.

TOP: - Photo showing 55-gallon drum in satellite accumulation area (paint shop). Note that drum is properly closed and labeled.

BOTTOM: - Randall-Textron's less-than-90 day container storage. Eleven (11) drums of hazardous waste were present at time of inspection.

Compliance Evaluation Inspection Checklists

Table of Contents

Part 1

General Site Information

Facility Name: RANDALL - TEXTRON
Address: HWY 332 EAST
GRENADA, MS 38901

I.D. Number: MSD007037278
Contact: DON WILLIAMS
Title: PLANT ENVIRONMENTAL COORDINATOR
Phone Number: (601) 226-1161

Type of Ownership:

____Federal ____State ____County ____Municipal ✓Private

Facility Status:

✓Generator ____Transporter ____Treatment ____Storage ____Disposal

Regulatory Status:

____Interim Status ✓Part B Submitted
____Permitted ____Part B in Preparation

Principal Inspector Name: D. PEACOCK Title: EA II
Organization: MDEQ Phone Number: (601) 961-5220

Inspection Participants:

Name	Title	Representing
DAVID PEACOCK	ENV. ADM.	MDEQ
DON WILLIAMS	PLANT ENV COORDINATOR	RANDALL-TEXTRON

Part ___

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ✓Yes __No __NA

   a. If yes, EPA I.D. No. MSD007037278
      If no, explain. _____

2. Has facility received hazardous waste from a foreign source? __Yes ✓No __NA

   a. If yes, has it filed a notice with the Regional Administrator? __Yes __No ✓NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ✓Yes __No __NA

   a. If yes, does it include: (264.13) (265.13)

      1. Parameters for which each waste will be analyzed? __Yes __No __NA
      2. Test methods used to test for these parameters? __Yes __No __NA
      3. Sampling method used to obtain sample? __Yes __No __NA
      4. Frequency with which the initial analyses will be reviewed or repeated? __Yes __No __NA
      5. (For offsite facilities) waste analyses that generators have agreed to supply? __Yes __No ✓NA
      6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

         a. Procedures to be used to determine the identity of each movement of waste. __Yes __No ✓NA
         b. Sampling method to be used to obtain representative sample of the waste to be identified. __Yes __No ✓NA

4. Does the facility provide adequate security through: (264.14) (265.14)

   a. 24-hour surveillance system (e.g., television monitoring or guards)? ✓Yes __No __NA

OR

b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? ✓Yes __No __NA

Describe CHAIN LINK FENCE

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? ✓Yes __No __NA

Describe GUARD HOUSE @ GATE

General Inspection Requirements (264.15) (265.15)

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

a. Monitoring equipment? ✓Yes __No __NA
b. Safety and emergency equipment? ✓Yes __No __NA
c. Security devices: ✓Yes __No __NA
d. Operating and structural equipment? ✓Yes __No __NA
e. Types of problems of equipment:

1. Malfunction ✓Yes __No __NA
2. Operator error ✓Yes __No __NA
3. Discharges ✓Yes __No __NA

6. Does the owner/operator maintain an inspection log? ✓Yes __No __NA

a. If yes, does it include:

1. Date and time of inspection? ✓Yes __No __NA
2. Name of inspector? ✓Yes __No __NA
3. Notation of observations? ✓Yes __No __NA
4. Date and nature of repairs or remedial action? ✓Yes __No __NA
5. Identification of potential problems? ✓Yes __No __NA

b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) ✓Yes __No __NA

c. Are records kept a minimum of three years? ✓Yes __No __NA

Note: Closed surface impoundment inspection WAS not noted (D. Williams stated USUAL INSPECTION IS done daily)

Personnel Training (264.16) (265.16)

7. Does the owner/operator maintain personnel training records at the facility? ✓Yes __No __NA

Date of most recent training: 9/21/95

TRAINING RESPONSIBILITY

HAZ. WASTE TRAINING — D. Williams
SAFETY TRAINING — Chet Melton

How long are they kept? PERMANENT

a. If yes, do they include:

1. Job title and written job description of each position? ✓Yes __No __NA
2. Description of type and amount of training? ✓Yes __No __NA
3. Records of training given to facility personnel? ✓Yes __No __NA

Requirements for Ignitable, Reactive, or Incompatible Waste (264.17) (265.17)

8. Does facility handle ignitable or reactive wastes? __Yes ✓No __NA

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flames confined to specifically designated locations? __Yes __No ✓NA

c. Are "No Smoking" signs posted in hazardous areas? __Yes __No ✓NA

d. Are precautions documented (Part 264 only)? __Yes __No ✓NA

9. Check containers

a. Are containers leaking or corroding? __Yes ✓No __NA

b. Is there evidence of heat generation from incompatible wastes? __Yes ✓No __NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31) __Yes ✓No __NA

If yes, use narrative explanation sheet to explain.

2. Is the facility equipped with: (264.32) (265.32)

a. Internal communication or alarm system? ✓Yes __No __NA

1. Is it easily accessible in case of emergency? ✓Yes __No __NA

b. Telephone or two-way radio to call emergency response personnel? ✓Yes __No __NA

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? ✓Yes __No __NA

d. Water of adequate volume of hoses, sprinkers, or water spray system? ✓Yes __No __NA

1. Describe source of water 200,000 gal WATER TANK

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35)(265.35) ✓Yes __No __NA

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (264.37) (265.37) __Yes __No __NA

5. In the case that more than one police or fire department might respond, is there a designated primary authority? ✓Yes __No __NA (264.37) (265.37)

a. If yes, name primary authority GRENADA FIRE Dept

CONTINGENCY PLAN ON SITE

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (264.37) (265.37) ✓Yes __No __NA

a. Are they reaily available to all personnel? ✓Yes __No __NA

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (264.37) (265.37) ✓Yes __No __NA

8. If State or local authorities declined to enter into agreements, is this entered in the operating record? (264.37) (265.37) __Yes __No ✓NA

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? (264.53) (265.53) — Yes / No / NA

   a. If yes, is it a revised SPCC Plan? — Yes / No / NA

   b. Does contingency plan include: (264.52) (265.52)

      1. Arrangements with local emergency response organizations? — Yes / No / NA
      2. Emergency coordinator's names, phone numbers and addresses? — Yes / No / NA
      3. List of all emergency equipment at facility and descriptions of equipment? — Yes / No / NA
      4. Evacuation plan for facility personnel? — Yes / No / NA

2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55) — Yes / No / NA

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? (264.71) (265.71) — Yes / No / NA

   a. If yes, does the owner/operator retain copies of all manifests? — Yes / No / NA

      1. Are the manifests signed and dated and returned to the generator? — Yes / No / NA
      2. Is a signed copy given to the transporter? — Yes / No / NA

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71) — Yes / No / NA

   a. If yes, is it accompanied by a shipping paper? — Yes / No / NA

      1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? — Yes / No / NA
      2. Is a signed copy given to the transporter? — Yes / No / NA

3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72) — Yes / No / NA

   a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? — Yes / No / NA

      1. If no, has Regional Administrator been notified? — Yes / No / NA

4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73) __Yes __No ✓NA

a. If yes, does it include:

1. Description and quantity of each hazardous waste received? __Yes __No __NA
2. Methods and dates of treatment, storage, and disposal? __Yes __No __NA
3. Location and quantity of each hazardous waste at each location? __Yes __No __NA
4. Cross-references to manifests/shipping papers? __Yes __No __NA
5. Records and results of waste analyses? __Yes __No __NA
6. Report of incidents involving implementation of the contingency plan? __Yes __No __NA
7. Records and results of required inspections? __Yes __No __NA
8. Monitoring, testing, and analytical data, for groundwater required by Subpart F? __Yes __No __NA
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? __Yes __No __NA
10. Notices of generators as specified in Section 264.12(b) (Part 264)? __Yes __No __NA

b. Does facility have copy of permit on site? __Yes __No ✓NA permit not iss

5. Does the facility submit a biennial report by March 1 every even-numbered year? (264.75) (265.75) ✓Yes __No __NA

a. If yes, do reports contain the following information:

1. EPA I.D. number? ✓Yes __No __NA
2. Date and year covered by report? ✓Yes __No __NA
3. Description/quantity of hazardous waste? ✓Yes __No __NA
4. Treatment, storage, and disposal methods? ✓Yes __No __NA
5. Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)? ✓Yes __No __NA
6. Most recent closure and post-closure cost estimates? ✓Yes __No __NA
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? ✓Yes __No __NA
8. Certification signed by owner/operator? ✓Yes __No __NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (264.76) (265.76) __Yes ✓No __NA

a. If yes, has he submitted an unmanifested waste report to the Executive Director? __Yes __No ✓NA

7. Does the facility submit to the Executive Director reports on releases, fires, and explosions; contamination and monitoring data; and facility closure?

✓ Yes __ No __ NA

Part ___

LAND DISPOSAL RESTRICTIONS CHECKLIST

Section A - General

1. Are hazardous wastes land-disposed on site? __Yes ✓No __NA

   a. If yes, are one or more of the following circumstances true:

      1. Granted extension from effective date pursuant to Section 268.5? __Yes __No ✓NA
      2. Granted exemption from a prohibition pursuant to a petition under Section 268.6? __Yes __No ✓NA
      3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1990? __Yes __No ✓NA
      4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? __Yes __No ✓NA
      5. Wastes not yet prohibited by Part 268? __Yes __No ✓NA

2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? __Yes ✓No __NA

3. Are there active surface impoundments used for treatment of hazardous wastes? __Yes ✓No __NA

   a. If yes, does the unit's design and operation meet the requirements set forth in Section 268.4? __Yes __No ✓NA

4. Has the facility sought exemption from any prohibition under Subpart C of Section 268 for the disposal of a restricted hazardous waste? __Yes ✓No __NA

   a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? __Yes __No ✓NA

5. Has the facility determined whether it generates a restricted waste through waste analysis? (268.7) ✓Yes __No __NA

   a. If yes, is the facility, in fact, handling a restricted waste(s)? ✓Yes __No __NA

   b. If yes, does the restricted waste require treatment? ✓Yes __No __NA

c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components (EPA hazardous waste number, corresponding treatment standard, manifest number of shipment)? ✓Yes __No __NA

6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? (268.10) ✓Yes __No __NA

a. If yes, do any of the following conditions apply:

1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? __Yes ✓No __NA
2. The solvent waste is generated from a CERCLA response corrective action? __Yes ✓No __NA
3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. __Yes ✓No __NA

b. If no, have any of these restricted wastes began land-disposed (except in an injection well) since November 8, 1986? __Yes ✓No __NA

7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? __Yes ✓No __NA

a. If yes, do any of the following conditions apply:

1. Wastes are treated to meet standards of Subpart D of Section 268? __Yes __No ✓NA
2. Wastes are disposed of at a facility that has been granted a petition? __Yes __No ✓NA
3. An extension has been granted? __Yes __No ✓NA

b. If no, were these restricted wastes land disposed after November 8, 1988? __Yes __No ✓NA

8. Are restricted wastes being treated? __Yes ✓No __NA

a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? __Yes __No ✓NA

Section B - Generator Compliance

1. Waste Identification

a. Does the generator handle the following wastes:

1. Solvent wastes

(i) F001, F002, F004, or F005 — Yes / No / NA
(ii) F003 — Yes / No / NA

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? — Yes / No / NA

Note: Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially misclassified F-solvents, Appendix A-2 presents a list of corresponding F and U wastes.

2. Dioxin wates (F020-F023, F026-F028) — Yes / No / NA
3. Potential California List Wastes (see Appendix C) — Yes / No / NA

(i) D002 — Yes / No / NA
(ii) D004-D011 — Yes / No / NA
(iii) Any other waste characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? — Yes / No / NA
(iv) Any F, K, P, or U wastes subject to "soft hammer" requirements that may qualify as California wastes due to HOCs, metals, or cyanide content? (See Appendix F) — Yes / No / NA

4. First Third Wastes (See MHWMR 268.10) — Yes / No / NA
5. Second Third Wastes (See MHWMR 268.11) — Yes / No / NA
6. (Reserved)

(i) Are any of the above "soft hammer" wastes? (See Appendices D & E) — Yes / No / NA

2. BDAT Treatability Group - Treatment Standards Identification

a. Does the generator mix restricted wastes with different treatment standards for constituents of concern? — Yes / No / NA

b. If yes, did the generator select the most stringent treatment standard for the constituent of concern [Section 268.41(b)]? ✓Yes __No __NA

c. F Solvents

Did the generator correctly determine the appropriate treatability group [Section 268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)? ✓Yes __No __NA

d. California Wastes

Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [Section 268.32(a)(3)]? ✓Yes __No __NA

e. First and Second Third Waste

1. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [Section 268.7(a)]? ✓Yes __No __NA

2. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)? __Yes ✓No __NA

3. Waste Analysis

a. Did the generator determine whether the waste exceeds treatment standards based on Section 268.7(a):

1. Knowledge of wastes __Yes __No __NA

(i) List wastes for which "applied knowledge" was used:

_____

_____

2. TCLP __Yes __No __NA

(i) List wastes for which "TCLP" was used:

_____

_____

(ii) MHWMR 268.41 lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? __Yes ✓No __NA

If yes, list: _____

_____

3. Total waste analysis __Yes ✓No __NA

4. If files were retained, describe content and basis of applied knowledge determination:

_____

_____

_____

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

_____

_____

_____

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

5. Were wates tested using TCLP or total constituent analysis when a process or wastestream changed [Section 264.13(a)(3)(i) or Section 265.13(a)(3)(i)]? __Yes __No __NA

b. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [Section 268.7(a)(1)]?

List those that exceeded standards: _____

_____

List those that did not exceed standards: _____

c. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [Section 268.3] __Yes __No __NA

6. Has the generator conducted any testing of those hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? __Yes __No __NA

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste? __Yes __No __NA

4. Management

a. Onsite management

1. Were restricted wastes managed onsite? __Yes __No __NA

2. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted? __Yes __No __NA

If yes, TSDF checklist must be completed.

b. Offsite Management

1. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? __Yes __No __NA
(ii) Corresponding treatment standard? __Yes __No __NA
(iii) Manifest number? __Yes __No __NA
(iv) Waste analysis, if available? __Yes __No __NA

Identify offsite treatment facilities
CHEM WASTE - EMELLE, AL LAIDLAW - MILLINGTON, TN

2. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

(i) EPA hazardous waste I.D. number? __Yes __No __NA
(ii) Corresponding treatment standard? __Yes __No __NA

(iii) Manifest number __Yes __No __NA
(iv) Certification regarding waste and that it meets treatment standards? __Yes __No __NA

Identify land disposal facilities receiving the BDAT certified wastes _____

_____

3. If the generator's waste is subject to a Section 268.5 case by case exemption, a Section 268.6 "no migration" exemption, or a nationwide variance does the generator's records indicate that he or she submits with each waste shipment [Section 268.7(a)(3)]:

(i) EPA Hazardous Waste Number? __Yes __No __NA
(ii) Corresponding Treatment Standards? __Yes __No __NA
(iii) All applicable prohibitions? __Yes __No __NA
(iv) The manifest number? __Yes __No __NA
(v) The date the wastes are subject to prohibitions? __Yes __No __NA
(vi) Does generator keep records of all notifications/certifications send to offsite facilities? __Yes __No __NA

List all prohibited wastes for which records are not provided per above [Section 268.7(a)(b):

_____

_____

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

_____

_____

4. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number? __Yes __No __NA
Applicable prohibitions? __Yes __No __NA
The manifest number? __Yes __No __NA
Waste analysis data, where available? __Yes __No __NA

(i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [Section 268.33(f)]? __Yes __No __NA

If yes, list facility of destination and waste of concern [Section 268.8(a)(2)]

_____

_____

(ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [Section 268.7(a)(2)]? __Yes __No __NA

(iii) Has the generator retained a copy of the demonstration on site [Section 268.8(a)(3)-(a)(4)]? __Yes __No __NA

(iv) Has the generator retained copies of all Section 268.8 certifications sent to the TSDF [Section 268.7(a)(6)] __Yes __No __NA

(v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [Section 268.8(a)(3)-(a)(4)]? __Yes __No __NA

(vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [Section 268.8(b)(3)]? __Yes __No __NA

5. Storage of Prohibited Waste

a. Were prohibited wastes stored for greater than 90 days? __Yes ✓No __NA

If yes, was facility operating as a TSD under interim status or final permit [Section 262.34(b)]? __Yes __No ✓NA

If yes, TSDF Checklist must be completed.

6. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e, boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? __Yes __No ✓NA

If yes, list type of treatment unit and processes

_____

_____

_____

If yes, TSDF checklist must be completed.

Section C - Treatment, Storage & Disposal Requirements

1. General

   a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?

   _____

   b. Describe the frequency of sampling conducted by the facility.

   _____

   _____

2. Treatment Facilities

   a. Has the treatment facility revised its waste analysis plan [Section 268.7(b)] to meet the requirements of Section 264.13 or 265.13? __Yes __No __NA

      (i) Is the treatment facility conducting TCLP tests for wastes subject to treatment standards expressed as waste extracts per 268.7(b)(i)? __Yes __No __NA

      (ii) Is the treatment facility using the paint filter test for the California waste residues [Section 268.7(b)(ii)]? __Yes __No __NA

      (iii) Is the treatment facility testing the pH of California waste residues? __Yes __No __NA

      (iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations [Section 268.7(b)(3)]? __Yes __No __NA

      (v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [Section 268.7(b)(1)] __Yes __No __NA

3. Land Disposal Facilities

a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? __Yes __No __NA

b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [Section 268.7(c)(2)]? __Yes __No __NA

c. Are they being tested in conformance with the frequency specified in the waste analysis plan [Section 268.7(c)(3)]? __Yes __No __NA

d. Are the appropriate tests (TCLP vs. total waste) being used [Section 268.7(c)(2)]? __Yes __No __NA

4. Storage (Section 268.50)

a. Are restricted wastes exceeding treatment standards <u>stored</u> (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? __Yes __No __NA

b. Are all containers clearly marked to identify content and date(s) entering storage [Section 268.50(a)(2)]? __Yes __No __NA

c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [Section 264.73 or Section 265.73]? __Yes __No __NA

d. Do operating records agree with container labeling? [Section 268.50(a)(2) or Section 264.73 or Section 265.73] __Yes __No __NA

e. Is waste exceeding treatment standards stored for less than 1 year? __Yes __No __NA

If yes, can you show that such accumulation is <u>not</u> necessary to facilitate proper recovery, treatment, or disposal? __Yes __No __NA

If yes, state how: _____

f. Was/is waste exceeding treatment standards stored for more than one year? __Yes __No __NA

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal:

_____

_____

5. Treatment in Surface Impoundments (Section 268.4)

a. Are prohibited wastes placed in surface impoundments for treatment? __Yes __No __NA

b. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [Section 268.4(b) and Section 268.3]? __Yes __No __NA

c. Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements, and the waste analysis plan to the Agency [Section 268.4(a)(4)]? __Yes __No __NA

d. Have the minimum technology requirements been met [Section 268.4(a)(4)]? __Yes __No __NA

1. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [Section 268.4(a)(3)(iii)]? __Yes __No __NA

e. Have the Subpart F groundwater monitoring requirements been met [Section 268.4(a)(3)]? __Yes __No __NA

f. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [Section 268.4(a)(2)]? __Yes __No __NA

g. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels? __Yes __No __NA

h. Provide the frequency of analyses conducted on treatment residues: _____

_____

Does the frequency meet the requirements of the waste analysis plan [Section 264.13 or Section 265.13]? __Yes __No __NA

i. Does the operating record adequately document the results of waste analyses performed [Section 264.13 or Section 265.13]? __Yes __No __NA

j. Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [Section 268.4(a)(2)(ii)]? __Yes __No __NA

1. If answer to f is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) __Yes __No __NA

k. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? __Yes __No __NA

l. When removed, were residues of restricted wastes managed subsequently in another surface impoundment? __Yes __No __NA

1. Were these residues subject to a valid 268.8 certification? __Yes __No __NA

m. When removed, were wastes treated prior to disposal? __Yes __No __NA

1. If yes, are waste residues treated on or offsite? __Yes __No __NA

2. Identify management method: _____
_____
_____

6. <u>Other Treatment</u>

a. Does the facility operate treatment units (regulated or exempt) (not including surface impoundments)? __Yes __No __NA

b. Describe the treatment processes, including exempt processes: _____
_____
_____

c. Does the facility treat soft-hammered wastes? __Yes __No __NA

1. If yes, is treatment occurring as described in the generator's certification/demonstration [Section 268.8(c)(1)]? __Yes __No __NA

2. Did the treatment facility certify he treated the soft-hammered waste as per the generator's demonstration and maintain copies of all certifications [268.8(c)(1)]? __Yes __No __NA

3. Did the treatment facility send a copy of the generator's demonstration and certification to the receiving treatment, recovery, or storage facility [Section 268.8(c)(2)]? __Yes __No __NA

d. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the restricted wastes are less than treatment standards or prohibition levels [Section 268.7(c)(2)]? __Yes __No __NA

e. Describe frequency of testing of treatment residuals.

_____

_____

_____

f. Was dilution used as a substitute for treatment [Section 268.3]? __Yes __No __NA

g. Are all notifications, certifications, and results of waste analyses kept in the operating record [Section 264.73(b) or Section 265.73(b)]? __Yes __No __NA

h. Are notices provided to land disposal facilities complete with Waste Number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [Section 268.7(b)(4) and (5) and Section 268.8(c)(1)]? __Yes __No __NA

i. If the waste or treatment residue will be further managed at another storage or treatment facility, has the treatment facility complied with the 268.7(a) notification and certification requirements applicable to generators [Section 268.7(b)(6)]? __Yes __No __NA

7. <u>Land Disposal</u>

a. Are restricted and/or prohibited wastes placed in land disposal units (landfills, surface impoundments*

waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vault or bunker?) __Yes __No __NA

b. Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards for generation or treatment [Section 268.7(c)(1) and 268.7(a),(b)]? __Yes __No __NA

c. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [Section 268.7(c)(2)]? __Yes __No __NA

If yes, was the frequency of testing as required by the facility's waste analysis plan [Section 264.13 or 265.13]? __Yes __No __NA

d. Were prohibited wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units [268.30] excluding national capacity variances [268.30(a)]? __Yes __No __NA

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case or capacity extension [268.5] or treatment standard variance [268.44][Section 268.30(d), Section 268.31(d), Section 268.32(g), Section 268.33(e)]? __Yes __No __NA

e. Were restricted wastes subject to a national capacity variance or case-by-case extension disposed? __Yes __No __NA

If yes, have the minimum technology requirements been met for all units receiving such wastes [Section 268.30(c), 268.31(c), 268.32(d), 268.33(d)]? __Yes __No __NA

f. Were adequate records of disposal maintained [Section 264.73(b) or 265.73(b)]? __Yes __No __NA

g. If wastes subject to a nationwide variances, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have generator's notices [268.7(a)(3)] and records of disposal? [Section 264.73(b) or Section 265.73(b)] __Yes __No __NA

h. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? __Yes __No __NA

i. If the owner/operator is disposing of a soft-hammer waste, is he maintaining the generators and treaters (if applicable) notices and certifications [Section 268.8(a)(2)-(a)(4)]? __Yes __No __NA

1. Is the facility disposing of any soft hammer wastes that may be classified as California wastes? __Yes __No __NA

2. Did the facility seek to verify whether these wastes may be subject to all restrictions, e.g., California ban? __Yes __No __NA

Part ____

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No.? (262.12) ✓Yes __No __NA

   a. If yes, EPA I.D. No. MSD 007037278

Section B - Manifest

1. Does generator ship waste offsite? (262.20) ✓Yes __No __NA

   a. If no, do not fill out Sections B and D.

   b. If yes, identify primary offsite facility(s). CHEM WASTE - EMELLE AL / LAIDLAW - WILLINGTON, TN

2. Does generator use manifest? (262.20) ✓Yes __No __NA

   a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? __Yes __No ✓NA

      1. If yes, does generator indicate this when sending waste to a TSD facility? __Yes __No ✓NA

   b. If yes, does manifest include the following information?

      1. Manifest document No. ✓Yes __No __NA
      2. Generator's name, mailing address, telephone number ✓Yes __No __NA
      3. Generator EPA I.D. No. ✓Yes __No __NA
      4. Transporter Name(s) and EPA I.D. No.(s) ✓Yes __No __NA
      5. a. Facility name, address, and EPA I.D. No. ✓Yes __No __NA
         b. Alternate facility name, address, and EPA I.D. No. ✓Yes __No __NA
         c. Instructions to return to generator if undeliverable ✓Yes __No __NA
      6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) ✓Yes __No __NA
      7. Emergency information (optional) (special handling instructions, telephone No.) ✓Yes __No __NA
      8. Is the following certification on each manifest form? __Yes __No __NA

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ✓Yes __No __NA

If yes, complete a through e.

a. 1. Did generator sign and date all manifests? ✓Yes __No __NA
   2. Who signed for generator?

   Name DON WILLIAMS Title PLANT ENV. COORD.

b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ✓Yes __No __NA
   2. Who signed and dated for transporter?

   Name _____ Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? ✓Yes __No __NA

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ✓Yes __No __NA

e. Does generator retain copies for 3 years? ✓Yes __No __NA

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? (261.30) ✓Yes __No __NA

   a. If yes, list waste and quantities (include EPA Hazardous Waste No.) D040, D002/D001

2. Does generator solid waste(s) listed in Subpart C that exhibit hazadous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20) ✓Yes __No __NA

   a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) _____

   b. Does generator determine characteristics by testing or by applying knowledge of processes? BOTH

      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ✓Yes __No __NA

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators? ✓Yes __No __NA

   a. If yes, did generator test all wastes to determine nonhazardous characteristics? ✓Yes __No __NA

      1. If no, list wastes and quantities deemed nonhazardous or processes from which non-hazardous waste was produced (use additional sheet if necessary).

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30) ✓Yes __No __NA

2. a. Are containers to be shipped leaking or corroding? __Yes ✓No __NA
   b. Use sheet to describe containers and condition.
   c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31) __Yes ✓No __NA

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? ✓Yes __No __NA

4. Does generator mark each package in accordance with 49 CFR 172? ✓Yes __No __NA

5. Is each container of 110 gallons or less marked with the following label? (262.32) ✓Yes __No __NA

   Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.

   Generator name(s) and address(es) _____

   _____

   Manifest document No. _____

6. Does generator have placards to offer to transporters? (262.33) __Yes __No __NA

7. Accumulation time: (262.34)

a. Are containers used to temporarily store waste before transport? __Yes ✓No __NA

1. If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time) __Yes __No ✓NA

b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ✓Yes __No __NA

2. If yes, with what frequency? DAILY

c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) __Yes __No ✓NA

NOTE: If tanks are used, fill out checklist for tanks.

d. Are the containers labeled and marked in accordance with Section D-3, D-4, and D-5 of this form? ✓Yes __No __NA

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ✓Yes __No __NA

8. Describe storage area. Use photos and narrative explanation sheet. SEE INSPECTION REPORT

Section E - Recordkeeping and Records (262.40)

1. Does generator keep the following reports for 3 years?

a. Manifests and signed copies from ✓Yes __No __NA
b. Biennial Reports ✓Yes __No __NA
c. Exception reports ✓Yes __No __NA
d. Test results ✓Yes __No __NA

2. Where are the records kept (at facility or elsewhere)?
FACILITY (D. WILLIAMS OFFICE)

3. Who is in charge of keeping the records?

Name DON WILLIAMS Title PLANT ENV. COORD.

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator? __Yes /No __NA

   a. If yes, has he filed a notice with the Regional Administrator? __Yes __No /NA
   b. Is this waste manifested and signed by a foreign cosignee? __Yes __No /NA
   c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? __Yes __No /NA

Part ___

CONTAINERS CHECKLIST

Section A - Use and Management (264.171) (265.171)

1. Are containers in good condition? ✓Yes __No __NA

Section B - Compatibility of Waste With Container (264.172)

1. Is container made of a material that will not react with the waste which it stores? ✓Yes __No __NA

Section C - Management of Containers (264.173) (265.173)

1. Is container always closed while holding hazardous waste? ✓Yes __No __NA

2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak? ✓Yes __No __NA

Section D - Inspections (264.174) (265.174)

1. Does owner/operator inspect containers at least weekly for leaks and deterioration? ✓Yes __No __NA

Section E - Containment (Part 264) (264.175)

1. Do container storage areas have a containment system? ✓Yes __No __NA

   a. Is the base free of cracks or gaps? ✓Yes __No __NA
   b. Is the base sloped or otherwise designed to drain and remove liquids? ✓Yes __No __NA
   c. Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container? ✓Yes __No __NA
   d. Is any method available to prevent run-on into the containment system? ✓Yes __No __NA
   e. Is spilled or leaked material or accumulated precipitation removed from the containment area in a timely manner? ✓Yes __No __NA

Section F - Ignitable and Reactive Waste (264.176) (265.176)

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? __Yes __No ✓NA

Section G - Incompatible Waste (264.177) (265.177)

1. Are incompatible wastes or materials placed in the same containers? __Yes __No ✓NA

2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? __Yes __No ✓NA

3. Are incompatible wastes separated from each other by a berm, dike, wall, or other device? __Yes __No ✓NA

Section H - Closure (Part 264) (264.178)

1. At closure, were all hazardous wastes and associated residues removed from the containment system? ✓Yes __No __NA

Part ___

SURFACE IMPOUNDMENTS CHECKLIST

Section A - Design Requirements (264.221) (265.221)

1. Does facility operate one or more surface impoundments? __Yes ✓No __NA

   a. If yes, has owner/operator installed two or more liners and a leachate collection system for any new units, replacement of any existing units, or lateral expansion of units? __Yes __No __NA

   b. Is owner/operator exempt from double-liner leachate collection system requirements because Regional Administrator has determined that impoundment's design will prevent the migration of hazardous constituents? __Yes __No __NA

   c. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? __Yes __No __NA

   d. If impoundment does not have a double liner, is it exempt due to one of the following reasons? __Yes __No __NA

      1. Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand.
      2. Monofill has at least one liner for which there is no evidence of leaking.
      3. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs.

   e. Does owner/operator take measures to prevent overfilling; wind and wave action; rainfall; run-on; malfunctions of level controllers, alarms, and other equipment; and human error (Part 264)? __Yes __No __NA

   f. Is impoundment surrounded by dikes (Part 264)? __Yes __No ✓NA

Section B - Operating Requirements

1. Does owner/operator maintain at least 60 cm (2 ft) of freeboard (Part 265)? (265.222)

2. Does owner/operator have certification from a qualified engineer that alternate design features will prevent overtopping? (Part 265) (265.222) __Yes __No ✓NA

Section C - Containment Systems

1. Do all dikes have a protective cover such as grass, shale or rock? (Part 265) (265.223) __Yes __No /NA

Section D - Waste Analysis and Trial Tests

1. Will the surface impoundment be used to: (265.225)

   a. Chemically treat a hazardous waste which is substantially different from wastes previously treated in the impoundment? (Part 265) __Yes __No /NA
   b. Chemically treat hazardous waste with a substantially different process than any previously used in that impoundment? __Yes __No /NA

2. If the answer in #1 was yes to any questions, has the owner/operator:

   a. Conducted waste analysis or trial treatment tests? __Yes __No /NA
   b. Obtained written, documented information on treatment of similar wastes under similar operating conditions? __Yes __No /NA

Section E - Inspections and Monitoring

1. Does the owner/operator:

   a. Inspect the freeboard at least one each operating day? (265.226) __Yes __No /NA
   b. Inspect the surface impoundment including dikes and vegetation at least once per week and after storms? (264.226) (265.226) __Yes __No /NA

2. Have any deteriorations or malfunctions that have been found been remediated? __Yes __No /NA

3. Has the owner/operator obtained a certification from a qualified engineer that the impoundments dike has structural integrity? (264.226) __Yes __No /NA

Section F - Emergency Repairs, Contingency Plans (Part 264) (264.227)

1. Does facility have a contingency plan? __Yes __No /NA

   a. If yes, does plan stipulate that impoundment be removed from service under the following conditions:

      1. Sudden drop in liquid level? __Yes __No /NA

2. Leaking dike? __Yes __No __NA

b. Does plan detail the steps to be followed when removing impoundment from service, including:

1. Shutting off flow into impoundment? __Yes __No __NA
2. Containing any surface leakage? __Yes __No __NA
3. Stopping the leak? __Yes __No __NA
4. Notifying Regional Administrator of problems in writing if leaks cannot be contained? __Yes __No __NA

c. If impoundment was removed from service, did owner/operator take the necessary precautions to rectify problems before restoring impoundment to service? __Yes __No __NA

d. If impoundment was removed from service and was not restored to service, was impoundment closed in accordance with an approved closure plan? __Yes __No __NA

Section G - Closure and Post-Closure (264.228) (265.228)

1. Is a closure plan retained at the facility? ✓Yes __No __NA

2. At closure, did owner/operator:

a. Remove standing liquids (Part 265)? ✓Yes __No __NA
b. Remove waste and waste residue (Part 265)? __Yes ✓No __NA
c. Remove liner (Part 265)? __Yes ✓No __NA
d. Remove underlying and surrounding contaminated soil? __Yes ✓No __NA
e. If not, did owner/operator demonstrate to Regional Administrator that the above materials were non-hazardous (Part 265)? __Yes ✓No __NA

1. If no, has owner/operator closed the impoundment and provided post-closure care (Part 265)? __Yes ✓No __NA

3. If regulated under Part 264, has owner/operator: (264.228)

a. Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment, and managed them as hazardous waste? __Yes __No __NA
b. Eliminated free liquids by removing or solidifying remaining wastes or waste residues? ✓Yes __No __NA
c. Stabilized remaining wastes to a bearing capacity sufficient to support final cover? ✓Yes __No __NA
d. Covered the impoundment with final cover? __Yes __No __NA

4. Did owner/operator leave any residuals in place at closure (Part 264)? (264.228) ✓Yes __No __NA

5. In post-closure, does owner/operator maintain integrity of cover and groundwater monitoring system, and prevent runon and runoff? (264.228) (265.228) ✓Yes __No __NA

Section H - Ignitable and Reactive Wastes (264.229) (265.229)

1. Are ignitable or reactive wastes placed in the impoundment? __Yes __No __NA

   a. If yes, are they treated, rendered, or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive? __Yes __No __NA

OR

   b. Is the impoundment used solely for emergencies? __Yes __No __NA

Section I - Incompatible Wastes (264.230) (265.230)

1. Are incompatible wastes placed in the impoundment? __Yes __No __NA

* AT PRESENT RANDOLL-TEXTRON IS NOT MONITORING GROUNDWATER — 4 well system is in place

Part ___

GROUNDWATER MONITORING CHECKLIST

Section A - Monitoring System

1. Does the facility have a groundwater monitoring system in operation? __Yes __No ✓NA

   a. If yes, does the system consist of: (265.91)(264.97)

      1. At least one upgradient/background well? __Yes __No __NA
      2. At least three downgradient wells? __Yes __No __NA

   b. Are wells identified in the field? ✓Yes __No __NA

   c. Are well heads in good condition (i.e. free of cracks)? ✓Yes __No __NA

   d. Are well heads locked? ✓Yes __No __NA

   e. Do well heads have bumper guards or are otherwise protected? ✓Yes __No __NA

Section B - Sampling and Analysis (Part 264)

1. Does the facility obtain and analyze samples from the groundwater monitoring system? __Yes __No __NA

2. Has facility developed and followed a groundwater sampling and analysis plan? (264.97(d)) __Yes __No __NA

   a. If yes, does this plan include procedures and techniques for:

      1. Sample collection? __Yes __No __NA
      2. Sample preservation? __Yes __No __NA
      3. Analytical procedures? __Yes __No __NA
      4. Chain-of-custody control? __Yes __No __NA
      5. Determining the groundwater surface elevation? __Yes __No __NA

3. Has facility specified a statistical method to be used in evaluating groundwater monitoring data? __Yes __No __NA

4. Is all groundwater monitoring data recorded in the operating record? __Yes __No __NA

Section C - Detection Monitoring Program (264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases? __Yes __No __NA

   a. If yes, are the following components included in the system:

      1. Background values? __Yes __No __NA
      2. Determination of groundwater flow rate and direction annually? (264.98(e)) __Yes __No __NA
      3. Determination of statistically significant increases over background concentrations at each well? (264.98(f)) __Yes __No __NA
      4. If there was a statistically significant increase indicated, did the facility notify the Executive Director per 264.98(g)(1)? __Yes __No __NA
      5. Did facility attempt to demonstrate an apparent increase was not caused by a regulated unit per MHWMR 264.98(g)(6)? __Yes __No __NA
      6. Is all information contained in the facility's operating record? __Yes __No __NA

Section D - Compliance Monitoring Program (264.99)

1. Does the facility operate a compliance monitoring program? __Yes __No __NA

   a. If yes, does the facility:

      1. Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) __Yes __No __NA
      2. Collect at least four samples from each well at least semi-annually? (264.99(f)) __Yes __No __NA
      3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well? __Yes __No __NA
      4. If an increase was indicated, did facility notify the Executive Director? __Yes __No __NA
      5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually? __Yes __No __NA
      6. Record all information in the operating record? __Yes __No __NA

Section E - Corrective Action Program (Part 264 only) (264.100)

1. Does facility follow a corrective action program that meets the facility's permit requirements? __Yes __No __NA

Section F - Sampling and Analysis (Part 265)

1. Has the facility developed and followed a groundwater sampling and analysis plan? __Yes __No __NA

   a. If yes, does the plan include procedures and techniques for:

      1. Sample collection? __Yes __No __NA
      2. Sample preservation? __Yes __No __NA
      3. Analytical procedure? __Yes __No __NA
      4. Chain-of-custody control? __Yes __No __NA

2. Has the owner/operator established initial background concentrations or values of all parameters specified in 265.92(b)? __Yes __No __NA

   a. Samples collected to establish background quality (from above)? __Yes __No __NA
   b. Samples collected to indicate contamination (from above)? __Yes __No __NA
   c. Elevation of groundwater surface at each monitoring well at each sampling event? __Yes __No __NA

Section G - Preparation, Evaluation, and Response (Part 265 only) (265.93)

1. Did owner/operator prepare an outline of a groundwater quality assessment program? __Yes __No __NA

   a. If yes, did program determine the following:

      1. Whether hazardous waste or hazardous waste constituents have entered the groundwater? __Yes __No __NA
      2. Rate and extent of hazardous waste or hazardous waste constituent migration? __Yes __No __NA
      3. Concentrations of hazardous waste or hazardous waste constituents in groundwater? __Yes __No __NA

   b. For each well, has owner/operator calculated the arithmatic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean? __Yes __No __NA

   c. Has owner/operator submitted information documenting any significant increase in comparisons for up-gradient wells (or decrease in pH)? __Yes __No __NA

   d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional groundwater samples from

those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error) __Yes __No __NA

1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days? __Yes __No __NA
2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Executive Director within 15 days after notification (discussed above) a certified groundwater quality assessment program? __Yes __No __NA
3. Did owner/operator implement the groundwater quality assessment program and, at a minimum, did he determine the following: __Yes __No __NA

   a. Rate and extent of migration of the hazardous waste constituents in the groundwater? __Yes __No __NA
   b. Concentrations of the hazardous waste in the groundwater? __Yes __No __NA

4. Did owner/operator submit a report to the Executive Director containing the requests of the assessment outlined in No. 3 above within 15 days? __Yes __No __NA
5. Did owner/operator notify the Executive Director of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the groundwater? __Yes __No __NA
6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the groundwater, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or grcund-water quality assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if ground-water quality assessment plan was implemented during post-closure? __Yes __No __NA
7. If any groundwater quality assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to the Executive Director, as outlined in No. 4 above? __Yes __No __NA
8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on groundwater elevation

obtained under No. 3c in Section F above to determine whether the requirements for locating monitoring wells are satisfied? __Yes __No __NA

a. If evaluation shows that the requirements for monitoring wells are not satisfied, has owner/operator modified the number, location, or depth of the monitoring wells to bring the system into compliance? __Yes __No __NA

Section H - Recordkeeping and Reporting (Part 265 only) (265.94)

1. Unless owner/operator is monitoring to satisfy the requirements of Section 265.93(d)(4), does owner/operator:

   a. Keep records of the analyses required in Section 265.92(c) and (d), groundwater surface elevations required in 265.93(b) throughout the active life of the facility and throughout post-closure? __Yes __No __NA

   b. Report the following information to the Executive Director:

      1. Within 15 days of analysis for each quarterly sampling event, does owner/operator submit results of background concentrations? __Yes __No __NA
      2. Does owner/operator inform the Executive Director about any parameters that exceed maximum contaminant levels listed in Appendix III? __Yes __No __NA
      3. (Annually) does owner/operator report concentrations or values of parameters listed in Section 265.92(b)(3) for each well, including required evaluationg for these parameters under Section 265.93(b)? __Yes __No __NA

         a. Does owner/operator also identify differences from initial background concentrations found in the upgradient wells no later than March 1 following each calendar year? __Yes __No __NA

2. Does owner/operator submit results of the groundwater surface elevations under Section 265.93(f), along with a description of the response, if needed? __Yes __No __NA

3. If groundwater is monitored to satisfy requirements of Section 265.93(d)(4), did owner/operator do the following:

a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure? __Yes __No __NA

b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the groundwater quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1? __Yes __No __NA

Part ___

FINANCIAL REQUIREMENTS CHECKLIST

Section A - Closure

1. Is facility required to provide financial assurance for closure? ✓Yes __No __NA

   a. Type of financial assurance FINANCIAL TEST
   b. Amount of closure costs $1,230,000
      1. Date of most recent adjustment _____
   c. Effective date of mechanism _____
   d. Expiration date of mechanism DEC 30, 1995
   e. Is instrument adequate? ✓Yes __No __NA

Section B - Post-Closure

1. Is facility required to provide financial assurance for post-closure care? __Yes __No __NA

N/A

   a. Type of financial assurance _____
   b. Amount of closure costs _____
      1. Date of most recent adjustment _____
   c. Effective date of mechanism _____
   d. Expiration date of mechanism _____
   e. Is instrument adequate? __Yes __No __NA

Section C - Corrective Action

1. Is facility required to provide financial assurance for corrective action? __Yes __No __NA

N/A

   a. Type of financial assurance _____
   b. Amount of closure costs _____
      1. Date of most recent adjustment _____
   c. Effective date of mechanism _____
   d. Expiration date of mechanism _____
   e. Is instrument adequate? __Yes __No __NA

Section D - Liability Requirements

1. Is facility required to provide liability coverage for sudden accidental occurrences? ✓Yes __No __NA

   a. Type of assurance FINANCIAL TEST
   b. Is amount at least $1 million per occurrence, $2 million annual aggregate? ✓Yes __No __NA
   c. Effective date of mechanism DEC 30, 1995

d. Expiration date of mechanism _____

2. Is facility required to provide liability coverage for non-sudden accidental occurrences? __Yes __No __NA

a. Type of assurance _____
b. Is amount at least $3 million per occurrence, $6 million annual aggregate? __Yes __No __NA
c. Effective date of mechanism _____
d. Expiration date of mechanism _____

CHCKLIST:1r

Appendix II - Less-than-Ninety Day Storage

1. Source/Data: _____

2. Type(s) of waste: D001/D002 D040

3. Condition of containers: GOOD

a. Containers closed?	✓Yes	__No __NA
b. Containers properly labelled?	✓Yes	__No __NA
c. Accumulation dates?	✓Yes	__No __NA
d. Area inspected?	✓Yes	__No __NA

Appendix I - Satellite Accumulation Area

1. Source/Area: PAINT Shop AREA

2. Type waste: WASTE SOLVENT

3. Condition of Containers: GOOD

   a. Containers closed? ✓Yes __No __NA
   b. Containers properly labeled? ✓Yes __No __NA

4. If > 55 gallons accumulated, has generator complied with 262.34(c)(2)? __Yes __No ✓NA